



# City of Seattle

Mayor Jenny A. Durkan

October 22, 2018

Andrew Wheeler  
Acting Administrator  
Environmental Protection Agency  
Docket ID No. EPA-HQ-OAR-2017-0355  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

RE: Comments on proposed “Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks”, Docket No. EPA-HQ-OAR-2018-0283

Dear Acting Administrator Wheeler:

The City of Seattle strongly opposes the proposed roll back of fuel economy standards as outlined in the so-called “Safe Affordable Fuel-Efficient” (SAFE) vehicle rule. Despite the name, the proposal is anything but safe or affordable. Rolling back fuel economy standards will increase fuel consumption and costs for consumers while adversely affecting human health and the environment. Voluntarily opting to burn more fossil fuels in vehicles is a startling proposal and will exacerbate the effects of climate change. The costs of this action and the societal burden of recovery and resiliency fall squarely on regional governments and residents. Transportation emissions are the largest source of greenhouse gas emissions in the Pacific Northwest. Our region and the country can simply not afford to go backwards on existing climate commitments.

Current SAFE standards, as developed in 2012 and confirmed in 2017, have provided a stable and known regulatory environment that has fostered investment and innovation in vehicle manufacturing for the U.S. market. Other countries, including China, have strengthened their commitment to vehicle electrification and expanding efficient vehicle offerings. The proposed rules to freeze fuel efficiency standards will alter the innovative trajectory of the U.S. vehicle market and put America’s manufacturing sector at a competitive disadvantage in the global market. The market will assuredly favor those who embrace new efficient technology consumers are craving. This proposal is akin to mandating that companies manufacture rotary telephones in the age of web-enabled smart phones. Moreover, increasing vehicle fuel requirements directly correlates to higher transportation costs for all American drivers. Voluntarily opting to raise living costs for working families is unconscionable.

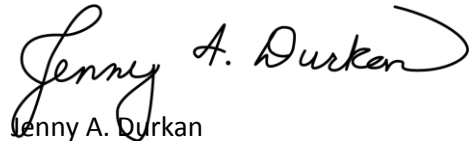
The EPA has a duty to enforce laws and policies that protect the well-being of the people of the United States. Air pollution from transportation sources are directly tied to increased risk of cardiovascular disease, respiratory illnesses like asthma and Chronic Obstructive Pulmonary Disease as well as cancer according to EPA-funded research. Impacts from carbon pollution burden the most vulnerable populations in our society including children, pregnant women, older adults, communities of color and

low-income populations who disproportionately face greater air pollution based on where they live. From a human health and environmental justice perspective, this proposal is regressive and dangerous.

Seattle is deeply committed to combating climate change and mitigating adverse impacts to our environment. This proposal will not only threaten the health of our residents but pollute our air, waterways and exacerbate greenhouse gas emissions (GHG). Approximately two-thirds of local GHG emissions come from the transportation sector. Seattle has made a commitment to be carbon neutral by 2050. The rollback in fuel economy standards undermines our climate action plan and will cause harm to our local environment through increased emissions and petroleum runoff into local waterways.

Protecting the health, safety, economic opportunity, and environment for our residents is the City's top priority. This proposal is extremely shortsighted and would be harmful to our communities, environment, manufacturing sector, and consumers at large. We strongly oppose the proposed rule.

Sincerely,

A handwritten signature in black ink that reads "Jenny A. Durkan". The signature is fluid and cursive, with a large loop at the end of the last name.

Jenny A. Durkan  
Mayor of Seattle